

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

JOYCE G. SLOAN,

Plaintiff,

v.

JULIE AYERS NORMAN

Defendant.

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Case No. 4:18-cv-00049

ANSWER

COMES NOW the Defendant, Julie Ayers Norman, by counsel, and files this Answer to the Complaint heretofore filed in this action:

1. Defendant admits a motor vehicle accident occurred involving Plaintiff and Defendant, but is without sufficient information and knowledge to admit or deny the facts and allegations in paragraphs 1 and 2 of Plaintiff's Complaint, and therefore denies.

2. Paragraph 2 of Plaintiff's Complaint is a statement of law, and as such, requires no response. To the extent a response is required, Defendant states Virginia law speaks for itself with regard to the applicable duty of care, and denies any allegation of negligence, proximate cause, or damages.

3. Defendant denies paragraphs 4, 5, and 6 of Plaintiff's Complaint.

4. Defendant denies paragraph 7 of Plaintiff's Complaint, including all subparts a-i.

5. Defendant denies paragraphs 8, 9, and 10 of Plaintiff's Complaint, and demands the strictest proof.

6. Defendant is without information and knowledge of the facts and allegations in paragraph 11 of Plaintiff's Complaint, and therefore denies.

7. Defendant denies Plaintiff's wherefore plea for damages.

8. Defendant joins in Plaintiff's request for trial by jury.

9. Defendant denies any liability to the plaintiff for the amount alleged in the Complaint or for any other sum whatsoever.

10. Defendant denies each and every allegation of negligence, proximate cause, or damages not specifically admitted herein.

11. Defendant denies breaching any legal duty owed the Plaintiff.

12. Defendant specifically alleges that the Plaintiff was negligent which bars her recovery in this matter.

13. Defendant reserves the right to rely upon any and all other properly provable defenses to this action, including all defenses in Fed. R. Civ. P. 12(b) and 8(c), and to amend this Answer at any time it be so advised.

14. Defendant affirmatively pleads the applicable statute of limitations.

15. Defendant affirmatively pleads Fed. R. Civ. P. 12(b)(6) with regard to the facts of the accident, sequence of events, and/or Plaintiff's damages.

16. Defendant reserves the right to conduct discovery and plead further.

WHEREFORE, Defendant respectfully requests Plaintiff's Complaint be dismissed, and for all other good and proper relief.

Respectfully submitted,

JULIE AYERS NORMAN

By: s/Johneal M. White

Johneal M. White (VSB #74251)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been sent via CMF/ECF this 7th day of August, 2017 to the following:

John F. Pyle
Crandall & Katt
366 Elm Ave., S.W.
Roanoke, Virginia 24016
Counsel for Plaintiff

s/Johneal M. White